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July 15, 2016

By ECF and U.S. Mail
The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Murillo-Bejarano, et al., 03 Cr. 1188*

Hon. Judge Berman:

Undersigned counsel writes to request an adjournment of the motions hearing originally scheduled for July 26, 2016, as ordered by this Court on June 24, 2016. This is the first request for such an adjournment and opposing counsel does not oppose this request.

With apologies to the Court for the inconvenience, Defendant Murillo-Bejarano was apparently without counsel in June 2016 and so did not file a motion regarding his eligibility for a sentencing reduction as directed by this Court. Defendant Murillo-Bejarano has now retained Florida attorney Oscar Arroyave to represent him in this matter.

Undersigned local stand-in counsel makes this request for adjournment to permit Attorney Arroyave the opportunity to obtain a License from the Treasury Department's Office of Foreign Assets Control ("OFAC"). (Defendant Murillo-Bejarano is on OFAC's list of restricted persons such that any attorney whom Defendant Murillo-Bejarano retains to represent him must obtain a license from OFAC to accept a fee. Attorney Arroyave has already requested such a license and is awaiting its processing; we anticipate that he will receive the license within 30 days.)

In the meantime, as he awaits the OFAC license, and if this Court grants the adjournment request, Attorney Arroyave will review the sentencing reduction issue as it pertains to Defendant Murillo-Bejarano; he will prepare any relevant motion; and undersigned local counsel will file a motion requesting leave for Attorney Arroyave to appear before this Court pro hac vice.

The original scheduling Order of this Court listed July 1 as the date for Defendant's motion regarding eligibility for a sentencing reduction, and July 8 as the date for the Government's

written submission. With that in mind, and having consulted with opposing counsel and Attorney Arroyave, undersigned counsel proposes the following revised scheduling order:

Action	Due Date
Defense Moving Papers	August 5, 2016
Government Response	August 12, 2016
Court Hearing	August 30 or 31, or September 6-8, 2016

If the Court devises a different scheduling order, we would request that it not schedule the hearing between August 17-23 and September 1-2, 2016.

Respectfully submitted,

/s/ _____
Alessandra DeBlasio
Local Stand-In Counsel for
Defendant Murillo-Bejarano

cc: Attorney Oscar Arroyave
AUSA David Denton